

Dvorak & Associates, LLC
Attorneys-at-Law

Lori A. Dvorak

Certified by the Supreme Court as a Civil Trial Attorney

Danielle Abouzeid



www.DvorakLegal.com

Grace E. Lempka
Jessica Magliette

467 Middlesex Avenue, Metuchen, NJ 08840
Phone: (732) 317-0130; Fax: (732) 317-0140

August 30, 2024

Via E-Filing:

Magistrate Judge Jessica S. Allen
Martin Luther King Building & U.S. Courthouse
50 Walnut Street #4015
Newark, NJ 07102

SO ORDERED

Re: Ortiz et al v. Twp. of Woodbridge et al
Docket No.: 2:19-cv-14139

/s/ Jessica S. Allen
Hon. Jessica S. Allen, U.S.M.J.

Dear Judge Allen:

Date: 8/30/24

As you aware, this office represents the interest of individual Defendants, Woodbridge Detective Brian Jaremczak, Sgt. Shayne Bodnar, Detective Patrick Harris, Detective Nicole Hubner, Patrolman Jeiann Rastegarpanah, and Detective Juan Carlos Bonilla, Jr.. As your Honor is aware, pursuant to the May 15, 2024 Amended Scheduling Order, Defendants are to file their moving papers in support of motions for summary judgment on or before September 5, 2024. Respectfully, undersigned is requesting a two week extension from September 5, 2024 to September 19, 2024.

A few weeks ago, Lori Dvorak, the partner at Dvorak & Associates, suffered a medical emergency. Undersigned was required to take over her entire caseload for this entire period. As such, while diligently working on the motion, more time is respectfully requested due to these extenuating circumstances.

Plaintiff's counsel, Paige Butler, Esq. and her firm were contacted, however due to her vacation, she was unable to respond to the request for consent to the extension.

I thank your for your courtesies, consideration and anticipated cooperation to this matter. Should you have any questions or concerns, please do not hesitate to contact the office.

Respectfully submitted,

/s/ Grace E. Lempka
GRACE E. LEMPKA, ESQ.

cc: All counsel of record via ECF

***The unopposed request is GRANTED. Individual Defendants, Woodbridge Detective Brian Jaremczak, Sgt. Shayne Bodnar, Detective Patrick Harris, Detective Nicole Hubner, Patrolman Jeiann Rastegarpanah, and Detective Juan Carlos Bonilla, Jr.. shall file their motion papers by September 19, 2024. There shall be no further extensions of this deadline. Plaintiff shall file opposition papers by October 24, 2024. Reply papers shall be filed by November 11, 2024.**